

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5
RCRA ACTIVITIES
P.O. BOX A3587
CHICAGO, ILLINOIS 60690



EOG ENVIRONMENTAL INC ATTN: MICHEAL VILIONE 5611 W HEMLOCK ST MILWAUKEE WI 53223

RE: EPA ID #:WID 988 58	80 056	
In response to your request of	2/22/91	the following
information has been updated:		
Mailing address to Installation contact to	5611 W HEMLOCK ST MICHAEL VILIONE	W S
Addition of waste codes	414/353-1156 AS LISTED	27 80

If you have any questions, please contact me at (312) 886-6173.

Sincerely,

Sharon Kiddon

RCRA Notifications Coordinator

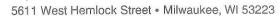
Waste Management Division

Sham Riddon

cc: State Agency

File

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EOG Disposal, Inc.

June 22, 1995

USEPA Region 5 RCRA Activities P.O. Box A3587 Chicago, Illinois 60690

Re: Notification of Regulated Waste Activity EOG Disposal, Inc.

EPA ID# WID988580056

(414) 353-1156 • Fax (414) 353-1822 (800) 234-1156



JUN 26 1995



To Whom It May Concern:

Pursuant to Chapter NR625.08(2)(h) Wisconsin Administrative Code, EOG Disposal Inc. is providing a subsequent notification of hazardous fuel activities as a marketer of hazardous waste fuels. This notification is a result of a recycling exemption application to the WIDNR. EOG operates a solid waste transfer and processing facility and is licensed by the WIDNR for processing and transferring of solid waste. On March 15, 1994 EOG was granted Interim License Approval by the WIDNR for the storage of hazardous waste. EOG is also a licensed hazardous waste transporter.

We trust this notification satisfies the requirements of Chapter NR625.08(2)(h), Wisconsin Administrative Code.

If you have any questions regarding this notification please contact me.

Sincerely,

EOG Disposal, Inc.

Kandylee Schmit Marketing Analyst

cc: Patrick Brady-WIDNR

Tom McElligott-Quarles & Brady

Please refer to the Instructions for Filing Notification before completing this form. The Information requested here is required by law (Section 3010 of the Resource Conservation and Recovery Art).

Notification of Regulated Waste Activity

Date Received (For Official Use Only)

JUN 26 1995

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	10 - For Official Use Only
VIII. Type of Regulated Waste Activity (Mark X' in the appropriate boxes. Refer to	Instructions:
A: Hazardous Waste Activity	B. Used Oli Fuel Activities
1. Generator (See Instructions) a. Greater than 1000kg/mc (2,200 lbs.) b. 100 to 1000 kg/mc (220 - 2,200 lbs.) c. Less than 100 kg/mc (220 lbs.) 7. Transporter (indicate Mode in boxes 1-5 below) a. For own waste only b. For commercial purposes: 1. Smaller, Storer, Disposer (ethicitation) Nota: A permit is required for this activity: see instructions. 4. Hazardous Waste Fuel a. Generator Marketing to Burner b. Offier Marketiers c. Boiler and/or Industrial Furnace	1. Off-Specification Used Off Fuel 2. Generator Marketing to Burner 1. Other Marketine 2. Burner - Indicate device(e) - Type of Combuston Device 1. Utility Boller 2. Industrial Boller
Mode of Trensportation 1. Air 2. Small Quantity Exemption Indicate Type of Combustion Device(s) 3. Highway 4. Water 5. Other – specify 5. Underground Injection Control	3. Industrial Furnace X 2. Specification Used Oil Fuel Marketer (or On-site Burner) Who First Claims the Oil Meets the Specification
IX. Description of Regulated Wastes (Use additional sheets if necessary)	
A. Characteristics of Nonlisted Hazardous Wastes. Mark 'X' in the boxes corresponding to the wastes your installation handles. (See 40 CFR Parts 261.20 - 261.24)	characteristics of nonlisted hazardous
4. Toxichy 1. ignitable 2. Corrosive 3. Reactive Characteristic (D001) (D002) (D003) (D000) (List specific EPA hazardous weste number(s) for X X X X X D 0 0 4 D 0 0	D 0 0 6 D 0 0 7
B. Listed Hazardous Wastes, (See 40 CFR 261.31 - 33. See instructions if you need to list month in the second of t	F 0 1 1 F 0 1 9
C. Other Wastes. (State or other wastes requiring a handler to have an LD; number. See instruction of the control of the contr	5 8 8
X Certification I certify under penalty of law that this document and all attachments were prepared.	d under my direction or supervision in
accordance with a system designed to assure that qualified personnel property submitted. Based on my inquiry of the person or persons who manage the system, or gathering the information, the information submitted is, to the best of my know complete. I am aware that there are significant penalties for submitting false information imprisonment for knowing violations.	rthose persons directly responsible for lifedge and belief, true, accurate, and
Signature Name and Official Title (type or print) Michael C. Vilione, Pre	Date Signed esident
XI. Comments	
Continuation of EPA Hazardous Waste Numbers	is attached
Note: Mall completed form to the appropriate EPA Regional or State Office. (See Section III	of the booklet for addresses.)

EOG Disposal, Inc. 5611 West Hemlock Street Milwaukee, WI 53223 WID988580056

CONTINUATION OF EPA HAZARDOUS WASTE NUMBERS FOR THE TOXICITY CHARACTERISTIC CONTAMINANTS

D008	D009
D010	D011
D012	D013
D014	D015
D016	D017
D018	D019
D020	D021
D022	D023
D024	D025
D026	D027
D028	D029
D030	D031
D032	D033
D034	D035
D036	D037
D038	D039
D040	D041
D042	D043

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WID988580056

-B.	Additional Listed Hazardous V	Wastes		
F012	K009	K094	K114	K038
F024	K010	K025	K115	K039
F020	K011	K026	K116	K040
F021	K048	K027	K117	K041
F022	K013	K028	K118	K098
F023	K014	K029	K136	K042
F026	K015	K095	K071	, . K043
F027	K016	K096	K073	K099
F028	K017	K030	K106	K123
K001	K018	K083	K031	K124
K002	K0 19	K10 3	K032	- K125
K003	K020	K104	K033	K126
K004	K021	K085	K034	K044
K005	K022	K105	K097	K045
K006	K023	K111	K035	K046
K007	K024	K112	K036	K047
K008	K093	K113	K037	K049
F025	F032	F034	F035	F037
F038	F039			

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WID988580056

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Subsequent Notification of Regulated Waste Activity

K087	K086	P010	P017	P038
K050	K060	P012	P018	P041
K051	P050	P011	P045	P040
K052	P023	P038	P021	P043
K061	P002	P036	P022	P060
K062	P057	P054	P095	P037
K064	P058	P067	P024	P051
K065	P003	P013	P026	P044
K066	P070	P024	P027	P046
K088	P004	P077	P029	P047
K090	P005	P028	P030	P048
K091	P006	P042	P031	P020
K069	P007	P046	P033	P085
K100	P008	P014	P034	P111
K084	P009	P001	P016	P039
K101	P119	P028	P036	P049
K102	P099	P015	P037	P049
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В.	Additional Listed Hazardou	s Wastes (continued)		
P122	P121	P089	P115	
P051	P112	P092	P109	U240
P066	P118	P093		U112
P101	P069	P094	P110	U214
P097	P071	P097	P112	U003
P056	P072		P113	U043
P065	P073	P110	P116	U006
P059	P074	P098	P123	
P062		P070	P118	U012
P116	P075	P102	P120	U136
P068	P076	P067	P121	U014
	P077	P114	U001	U015
P063	P078	P103	U034	U157
P096	P081	P104	U249	U016
P092	P084	P105	U239	U017
P065	P085	P106	U248	U192
P082	P087	P107	U187	U018
P064	P088	P108	U005	U094
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WID988580056

Subsequent Notification of Regulated Waste Activity

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U049	U207	U036	U129	U074
U093	U023	U026	U 057	U075
U328	U234	U039	U130	U078
U353	U021	U042	U058	U079
U222	U202	U044	U240	U025
U019	U203	U047	U05 9	U027
U038	U248	U048	U060	U024
U030	U022	U049	U061	U081
U035	U197	U032	U062	U082
U037	U225	U050	U063	U084
U221	U031	U051	U064	U085
U028	U136	U052	U066	U108
U223	U215	U053	U069	U028
U239	U033	U055	U070	U086
U201	U156	U246	U071	U087
U220	U211	U197	U072	U088
U020	U034	U056	U073	U089

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WID988580056

Subsequent Notification of Regulated Waste Activity

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Ü 090	U109	U218	U077	U128
U091	U110	U226	U359	U130
U092	U111	U227	U115	U132
U093	U041	U359	U116	U243
U094	U 177	U173	U07 6	U133
U095	U174	U 004	U118	U134
U096	U155	U043	U119	U135
U097	U067	U042	U120	U137
U098	U076	U 078	U122	U190
U099	U077	U079	U123	U140
U101	U131	U210	U124	U141
U102	U024	U228	U125	U142
U103	U117	U112	U147	U143
U105	U02 5	U113	U206	U144
U106	U184	U238	U126	U146
U107	U208	U114	U163	U145
U108	U209	U067	U127	U129

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WID988580056

Subsequent Notification of Regulated Waste Activity

		s reacts (continued)		
U148	U044	U161	U173	U186
U215	U121	U162	U174	U187-
U150	U036	U164	U176	U188
U151	U154	U010	U177	U353
U152	U155	U121	U178	U328
U092	U234	U167	U179	U223
U029	U247	U168	U180	U220
U045	U029	U026	U181	U244
U046	U186	U165	U228	U052
U068	U045	U047	U227	U219
U080	U156	U166	U193	U153
U176	U226	U236	U222	U189
U138	U157	U217	U041	U190
U237	U158	U169	U182	U191
U211	U159	U170	U183	U192
U235	U160	U171	U184	U083
U225	U138	U172	U185	U027

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В.	Additional Listed Hazardous	Wastes (continued)	
U002	U205	U194	U202
U007	U216	U083	U203
U084	U206	U196	U204
U243	U189	U191	
U009	U207	U237	
U152	U213	U200	
U008	U214	U201	

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EOG Disposal, Inc.

March 30, 1995

(414) 353-1156 • Fax (414) 353-1822 (800) 234-1156



APR 0 7 1995

U. S. EPA, REGION V SWB - PMS

USEPA Region 5 RCRA Activities P.O. Box A3587 Chicago, Illinois 60690

Re: Notification of Regulated Waste Activity

To Whom It May Concern:

Pursuant to Chapter NR600.05(2), Wisconsin Administrative Code, EOG Disposal Inc. is providing a notification of regulated waste activity as a storer of hazardous waste. EOG operates a solid waste transfer and processing facility and is licensed by the WDNR for processing and transferring of solid waste. On March 15, 1994 EOG was granted Interim License Approval by the WDNR for the storage of hazardous waste. EOG is also a licensed hazardous waste transporter.

This notification is submitted in order to inform the EPA and Wisconsin DNR that EOG Disposal, Incorporated intends to utilize part of its facility as a transfer facility.

If you have any questions regarding this notification, please contact me at (414) 353-1156.

Sincerely,

EOG Disposal, Inc.

Kandylee Schmit

cc: Patrick Brady - WDNR

Tom McElligott - Quarles & Brady

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Form Approved, OMB No. 2050-0028 Expires 9-30-96 GSA No. 0246-EPA-OT

Date Received

(For Official Use Only)

Please refer to the Instructions for Filling Notification before completing this form. The information requested here is required by lew (Section 3010 of the Resource Conservation and Recovery Act).

United States Environmental Protection Agency

Notification of Regulated Waste Activity

U. S. EPA, REGION V

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not	(5D. Jose Water	ID - For Of	licial Use Only
<u> </u>	\ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \		
VIII. Type of Regulated Waste Activity (Ma	ark 'X' in the appropriate boxes; Ref	er to Instructions)	
A. Hazardous V	aste Activity	B. Used	Oil Recycling Activities
1. Generator (See Instructions) a. Greater than 1000kg/mo (2,200 lbs.) b. 100 to 1000 kg/mo (200-2,200 lbs.) c. Less than 100 kg/mo (220 lbs) 2. Transporter (Indicate Mode in boxes 1-5 below) a. For own waste only b. For commercial purposes Mode of Transportation 1. Air 2. Rall 3. Highway 4. Water 5. Other - specify	3. Treater, Storer, Disposinstallation) Note: A perequired for this activit instructions. 4. Hazardous Waste Fuel a. Generator Marketing to b. Other Marketers c. Boilerand/or Industrial F 1. Smelter Deferral 2. Small Quantity Exer Indicate Type of Comb Device(s) 1. Utility Boiler 2. Industrial Boiler 3. Industrial Furnace 5. Underground Injection Co	mit is y; see Oil to O b. Markete Oil Meel 2. Used Oil E Combustio a. Utility B b. Industri c. Industri 3. Used Oil T of Activity(a. Transpo b. Transfel 4. Used Oil Pr Type(s) of	r Directs Shipment of Used If-Specification Burner or Who First Claims the User is the Specifications Burner - Indicate Type(s) on Device(s) oiler al Boiler al Furnace ransporter - Indicate Type(sies) orter of Facility ocessor/Re-refiner - Indicate Activity(ies)
IX. Description of Hazardous Wastes (Usa		<u> </u>	
(D001) (D002) (D003) C	oxicity Characteristic (List specific EPA hazardous) D 0 0 4	- 261.24) s waste number(s) for the Toxi	city characteristic contaminant(s))
B. Listed Hazardous Wastes. (See 40 CFR.	261.31 - 33; See instructions if you no	od to list more than 12 w	rasté codes.) 🤘
F 0 0 1 F 0 0 2 F 0 0 8	F 0 0 9 F 0 1	5 F 0 0 1 F 0 1	5 F 0 0 6 12 X 1 F 0 1 9
C. Other Wastes. (State or other wastes requ	iring a handler to have an I.D. numbe	r; See instructions.)	
1 2 X. Certification	3 4	5	6
I certify under penalty of law that this document system designed to assure that qualified personn or persons who manage the system, or those per best of my knowledge and belief, true, accurate, a including the possibility of fine and imprisonme	iel properly gather and evaluate the inf rsons directly responsible for gatherin and complete. I am aware that there are	ormation submitted. Base	d on my inquiry of the person
Signature / //	Name and Official Title (Type	or print)	Date Signed
M. C. 1/12	President	-	3/30/95
701			
XI. Comments			
Note: Mail completed form to the appropriate EP	A Regional or State Office. (See Sec	tion III of the booklet for a	addresses.)



EOG Disposal, Inc. 5611 West Hemlock Street Milwaukee, WI 53223 WID988580056 U. S. EPA, REGION V SWB — PMS

CONTINUATION OF EPA HAZARDOUS WASTE NUMBERS FOR THE TOXICITY CHARACTERISTIC CONTAMINANTS

D008	D009
D010	D011
D012	D013
D014	D015
D016	D017
D018	D019
D020	D021
D022	D023
D024	D025
D026	D027
D028	D029
D030	D031
D032	D033
D034	D035
D036	D037
D038	D039
D040	D041
D042	D043

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F038

F039

B.	Additional Listed Hazardous	Wastes		
F012	K009	K094	K114	K038
F024	K010	K025	K115	K039
F020	K011	K026	K116	K040
F021	K048	K027	K117	K041
F022	K013	K028	K118	K098
F023	K014	K029	K136	K042
F026	K015	K095	K071	K043
F027	K016	K096	K073	K099
F028	K017	K030	K106	K123
K001	K018	K083	K031	K124
K002	K019	K103	K032	· K125
K003	K020	K104	K033	K126
K004	K021	K085	K034	K044
K005	K022	K105	K097	K045
K006	K023	K111	K035	K046
K007	K024	K112	K036	K047
K008	K093	K113	K037	K049
F025	₩ F032	F034	ρ F035	F037
F038	√F039			**

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Subsequent Notification of Regulated Waste Activity REGEIVED APR 0 7 1995

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В.	Additional Listed Hazardous	Wastes (continued)	_	
K087	K086	P010	P017	P038
K050	K060	P012	P018	P041
K051	P050	P011	P045	P040
K052	P023	P038	P021	P043
K061	P002	P036	P022	P060
K062	P057	P054	P095	P037
K064	P058	P067	P024	P051
K065	P003	P013	P026	P044
K066	P070	P024	P027	P046
K088	P004	P077	P029	P047
K090	P005	P028	P030	P048
K091	P006	P042	P031	P020
K069	P007	P046	P033	P085
K100	P008	P014	P034	P111
K084	P009	P001	P016	P039
K101	P119	P028	P036	P049
K102	P099	P015	P037	P088

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WID988580056

В.	Additional Listed Hazardou			
P122	P121	P089	P115	U240
P051	P112	P092	P109	U112
P066	P118	P093	P110	U214
P101	P069	P094	P112	U003
P097	P071	P097	P113	U043
P056	P072	P110	P116	U006
P065	P073	P098	P123	U011
P059	P074	P070	P118	U012
P062	P075	P102	P120	U136
P116	P076	P067	P121	U014
P068	P077	P114	U001	U015
P063	P078	P103	U034	U157
P096	P081	P104	U249	U016
P092	P084	P105	U239	U017
P065	P085	P106	U248	U192
P082	P087	P107	U187	U018
P064	P088	P108	U005	U094

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U. S. EPA, REGION V SWB — PMS

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В.	Additional Listed Hazardon	us Wastes (continued)		
U049	U207	U036	U129	U074
U093	U023	U026	U057	U075
U328	U234	U039	U130	U078
U353	U021	U042	U058	U079
U222	U202	U044	U240	U025
U019	U203	U047	U059	U027
U038	U248	U048	U060	U024
U030	U022	U049	U061	U081
U035	U197	U032	U062	U082
U037	U225	U050	U063	U084
U221	U031	U051	U064	U085
U028	U136	U052	U066	U108
U223	U215	U053	U069	U028
U239	U033	U055	U070	U086
U201	U156	U246	U071	U087
U220	U211	U197	U072	U088
U020	U034	U056	U073	U089

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EOG Environmental, Inc. 5611 West Hemlock Street Milwaukee, WI 53223

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WID988580056

Subsequent Notification of Regulated Waste Activity

В.	Additional Listed Hazardous	Wastes (continued)		
U090	U109	U218	U077	U128
U091	U110	U226	U359	U130
U092	U111	U227	U115	U132
U093	U041	U359	U116	U243
U094	U177	U173	U076	U133
U095	U174	U 004	U118	U134
U096	U155	U043	U119	U135
U097	U067	U042	U120	U137
U098	U076	U 078	U122	U190
U099	U077	U079	U123	U140
U101	U131	U210	U124	U141
U102	U024	U228	U125	U142
U103	U117	U112	U147	U143
U105	U025	U113	U206	U144
U106	U184	U238	U126	U146
U107	U208	U114	U163	U145
U108	U209	U067	U127	U129

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EOG Environmental, Inc. 5611 West Hemlock Street Milwaukee, WI 53223

WID988580056

Subsequent Notification of Regulated Waste Activity

В.	Additional Listed Hazardous Wa	astes (continued))	
U148	U044	U161	U173	U186
U215	U121	U162	U174	U187
U150	U036	U164	U176	U188
U151	U154	U010	U177	U353
U152	U155	U121	U178	U328
U092	U234	U167	U179	U223
U029	U247	U168	U180	U220
U045	U029	U026	U181	U244
U046	U186	U165	U228	U052
U068	U045	U047	U227	U219
U080	U156	U166	U193	U153
U176	U226	U236	U222	U189
U138	U157	U217	U041	U190
U237	U158	U169	U182	U191
U211	U159	U170	U183	U192
U235	U160	U171	U184	U083
U225	U138	U172	U185	U027

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EOG Environmental, Inc. 5611 West Hemlock Street Milwaukee, WI 53223

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Subsequent Notification of Regulated Waste Activity

B.	Additional Listed Hazardous	Wastes (continued)	
U002	U205	U194	U202
U007	U216	U083	U203
U084	U206	U196	U204
U243	U189	U191	
U009	U207	U237	
U152	U213	U200	
U008	U214	U201	

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5 77 WEST JACKSON BOULEVARD CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

May 11, 1995

EOG DISPOSAL INC ATTN KANDYLEE SCHMIT 5611 W HEMLOCK ST MILWAUKEE WI 53223

RE:	US EP	A ID Num	ıber	WID 988 5	80 05	6				
	Locat	ion: _		5611 W HE	MLOCK	ST				
		42.40.400		MILWAUKEE	C WI 5	3223				
In re	sponse	to your	corresp	ondence of	4 07	7 95			_, the	following
infor	mation	has bee	en update	d:		•			-	
ADDITI	ON OF	WASTE	CODES	F002 F009	D002 F003 F010	F004 F011	F005 F019	F006 F025	F007	

If you have any questions, please call me at (312) 886-6173.

Sincerely,

Sharon Kiddon

RCRA Notifications Coordinator

Waste Management Division

cc: State Agency

File

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(Waste Codes)		KECE WMD RECO	PD CENTER	
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Form Approved, OMB No. 2050-0028 Expires 9-30-96 GSA No. 0246-EPA-OT

GSA No. 0248-EPA-O

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Notification of Regulated Waste Activity

Date Received (For Official Use Only)

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EPA Form 8700-12 (Rev. 11-30-93) Previous edition is obsolete.

Continued on Reverse

Characteristic Contaminants is attached.

Note: Mail completed form to the appropriate EPA Regional or State Office. (See Section III of the booklet for addresses.)

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EOG Disposal, Inc. 5611 West Hemlock Street Milwaukee, WI 53223 WID988580056

CONTINUATION OF EPA HAZARDOUS WASTE NUMBERS FOR THE TOXICITY CHARACTERISTIC CONTAMINANTS

D018

D019

D020

D021

D022

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D024

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SEP 26 1994

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CONVERSATION RECORD

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EOG Disposal, Inc.

(414) 353-1156 • Fax (414) 353-1822

(800) 234-1156

APR 2 8 1994

U. S. EPA, REGION V SWB — PMS

April 19, 1994

USEPA Region 5 RCRA Activities P.O. Box A3587 Chicago, Illinois 60690

Re:

Notification of Hazardous Fuel Marketing Activities

EOG Disposal, Inc.

EPA I.D. #WID988580056

To Whom It May Concern:

Pursuant to Chapter NR625.07(6)(b), Wisconsin Administrative Code, EOG Disposal, Inc. (EOG) is providing notification of hazardous fuel activities as a marketer of hazardous waste fuels. This notification is a result of the March 15, 1994 Interim License Approval granted by the Wisconsin Department of Natural Resources (WDNR) for the storage of hazardous waste.

EOG operates a solid waste transfer and processing facility and is licensed by the WDNR for processing and transferring of solid waste. The waste materials received at EOG are generated by industry, commercial establishments, small businesses, educational facilities, and other institutions. The activities conducted at the facility are based on the objective of redirecting materials from waste streams for the purpose of beneficial use, including fuels for re-refining and fuel blending. EOG is authorized to accept six categories of waste under their existing solid waste permit. These include off-specification and used chemical products, oils, coolants, cleaning solutions, wastewater and paints.

As a result of Wisconsin's incorporation of the Toxic Characteristic Leaching Procedure (TCLP) requirements, some of the nonhazardous waste streams previously handled by EOG are now classified as hazardous waste. For EOG to continue to handle these waste types, an interim status license was applied for and obtained for hazardous waste storage. Some materials, such as used oil destined for burning, is exempt from federal hazardous waste regulation but under Wisconsin law is subject to hazardous waste regulations. The interim status storage license is limited to materials that EOG was authorized to accept prior to the promulgation of the TCLP regulations, materials which are hazardous waste only because of the implementation of the TCLP regulations, and materials that are not considered to be hazardous waste by the federal government but are considered to be hazardous waste by Wisconsin.

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USEPA Region 5 April 19, 1994 Page Two

Waste codes EOG is eligible to accept include: D012 Endrin; D013 Lindane; D014 Methoxychlor; D015 Toxaphene; D016 2,4D; D018 Benzene; D019 Carbon Tetrachloride; D020 Chlordane; D021 Chlorobenzene; D022 Chloroform; D023 o-Cresol; D024 m-Cresol; D025 p-Cresol; D026 Cresol; D027 1,4-Dichlorobenzene; D028 1,2-Dichloroethane; D029 1,1-Dichloroethylene; D030 2,4-Dinitrotoluene; D032 Hexachlorobenzene; D033 Hexachlorobutadiene; D034 Hexachloroethane; D035 Methyl Ethyl Ketone; D036 Nitrobenzene; D037 Pentachlorophenol; D038 Pyridine; D039 Tetrachloroethylene; D040 Trichloroethylene; D041 2,4,5-Trichlorophenol; D042 2,4,6-Trichlorophenol; and D043 Vinyl Chloride.

We trust this notification satisfies the requirements of Chapter NR625.07(6)(b), Wisconsin Administrative Code. If you have any questions regarding this notification, please contact me at (414) 353-1156.

Sincerely,

EOG DISPOSAL, INC.

Michael C. Vilione

President

MDV/rjs

cc: Patrick Brady - WDNR

Tom McElligott - Quarles & Brady

Doug Wierman - RMT, Inc.



Please refer to the Instructions for Filing Notification before completing this form. The information requested here is required by law (Section 3010 of the Resource Conservation and Resource Conserva



Regulated Waste Activity

Date Received (For Official Use Only)

FEB 2 6 1991

I. Installation's EPA ID Number (Mark 'X' in the appropriate box) A. First Notification X B. Subsequent Notification (complete item C) W I D 9 8 8 5 8 0 0 5 0 0 5 0 0 0 0	
A. First Notification	
II. Name of Installation (Include company and specific site name) II. Name of Installation (Include company and specific site name) III. Location of Installation (Physical address not P.O. Box or Route Number) Street	
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III. Location of Installation (Physical address not P.O. Box or Route Number) Street 5 6 1 1 WESTHEEN LOCKSTREET Street (continued) City or Town MILWAUKEE WI5 3 2 3 3 - 4 7 1 County Code County Name 0 7 9 MILWAUKEE IV. Installation Mailing Address (See instructions) Street or P.O. Box State ZIP Code WI5 3 2 3 3 - 4 7 1 City or Town State ZIP Code WI5 5 3 2 3 3 - 4 7 1 City or Town State ZIP Code WI5 5 3 2 3 3 - 4 7 1 City or Town State ZIP Code WI5 5 3 2 2 3 - 4 7 1 City or Town MILWAUKEE WI5 5 3 2 2 3 - 4 7 1	
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IV. Installation Mailing Address (See Instructions) Street or P.O. Box 5 6 1 1 WESTHEMLOCKSTREET City or Town MILWAUKEE WISTS 3 2 2 3 - 4 7 V. Installation Contact (Person to be contacted regarding waste activities at site) Name (last)	
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VI. Installation Contact Address (See instructions) A. Contact Address B. Street or P.O. Box	
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VII. Ownership (See instructions)	
A. Name of Installation's Legal Owner	
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	ab – For Official Use Only
VIII. Type of Regulated Waste Activity (Mark 'X' in the appropria	ite boxes. Refer to instructions.
A. Hazardous Waste Activity	B. Used Oil Fuel Activities
2. Transporter (Indicate Mode in boxes 1-5 below) a. For own waste only b. For commercial purposes Mode of Transportation 1. Air 2. Indus	X a. Generator Marketing to Burner instructions. X b. Gither Marketer X b. Gither Marketer X b. Gither Marketer D. Gi
IX. Description of Regulated Wastes (Use additional sheets if ne	ecessary)
7 8 9	Testic (TC) separate number(s) for the TC separate number(s) for t
X. Certification	
I certify under penalty of law that I have personally examined and all attached documents, and that based on my inquirobtaining the information, I believe that the submitted inforthat there are significant penalties for submitting talse imprisonment.	ry of those individuals immediately responsible for transfer in a strue, accurate, and complete. I am aware
Signature	type or print) Date Signed 2/22/91
XI. Comments	
Note: Mail completed form to the appropriate EPA Regional or State Offi	ice. (See Section III of the booklet for addresses.)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Region V P.O. Box A3587 Chicago, Illinois 60690

TOXIC CHARACTERISTIC NOTIFIER

The Toxic Characteristic Rule, promulgated on March 29, 1990, redefines the characteristic of toxicity under RCRA. Your notification indicates that you are handling waste with toxic characteristics. In order for EPA to process your notification in a timely manner, we need the following information:

to pro	cess your notification in a timely m	anner, we need the follo	owing information	1;	-4.6
[]	I am a new notifier under the Te	oric Characteristic Rule.			
	Please list the specific four-chars guidelines on determining the co 261.30-33. Some of the Toxic Cl	rrect four-character cod	e, see 40 Code of	Federal Regulations	l.
-	e e e e e e e e e e e e e e e e e e e			Aurini Aurini	
[]	I have marked TOXIC by error. the area below.	I have attached a corre	cted Notification	I may make commen	ts in
[X]	I am a subsequent notifier whose Notification of Regulated Waste	activity is changing und Activity (form 8700-12).	er the TC Rule.	I have enclosed a	
Nev	You can assist us by specifying we change in waste activity, new con If there are no changes, you are No Mailing Address, New Con	tact person, etc.). OT REQUIRED TO NO	TIFY.	LDEAD'I	ides,
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Note:	The deadline for notifying the EF prompt attention to this matter is	'A of your waste activity required.	under TC has al	ready passed. Your	
	COMPLETE IN FULL and subm	nit your Notification alor	ng with this letter	to:	
P.O.	PA Activities Box A3587 ago, IL 60690		Midde on tions Coordinato ement Divisi		
) 886-6173			1001	

FEB 2 6 1991

U. S. EPA, REGION V

EPA Hazardous Waste Code 1	Constituent	Chronic toxicity reference level (mg/L)	Regulatory level (mg/L)	
D004	Arsenic	l 0.05	5.0	
D005	Barium	1.0	100.0	
D018	Benzene	0.005	0.5	
D006	Cadmium	0.01	1.0	
D019	Carbon tetrachloride	0.005	0.5	
D020	Chlordane	0,0003	0.03	
D021	Chlorobenzene	1	100.0	
D022	Chloroform	0.06	6.0	
D007	Chromium	0.05	5.0	
D023	i o-Cresol	2	200.0 2	
D024	m-Cresol	$\overline{2}$	200.0	
D025	p-Cresol	$\bar{2}$	200.0	
D026	Cresol	$\bar{1}$	200.0 1	
D016	1 2.4-D	0.1	10.0	
D027	1,4-Dichlorobenzene	0.075	7.5	
D028	1,2-Dichloroethane	0.005	0.5	
D029	1,1-Dichloroethylene	0.007	0.7	
D030	2.4-Dinitrotoluene	0.0005	0.13	
D012	Endrin	0.0002	0.02	
D031	Heptachlor (and its hydroxide)	0.0006	0.008	
D032	Hexachlorobenzene	0.0002	0.13	
D033	Hexachloro-1,3-butadiene	0.005	0.5	
D034	Hexachloroethane	0.03	3.0	
D008	Lead	0.05	5.0	
D013	Lindage	0.004	0.4	
D009	Mercury	0.002	0.2	
D014	Methoxychlor	0.1	10.0	
D035	Methyl ethyl ketone	2	200.0	
D036 j	Nitrobenzene	0.02	2.0	
D037	Pentachlorophenol	1	100.0	
D038	Pyridine	0.04	5.0	
D010	Selenium	0.01	1.0	
D011	Silver	0.05	5.0	
D039	Tetrachloroethylene	0.007	0.7	
D015	Toxaphene	0.005	0.5	
D040	Trichloroethylene	0.005	0.5	
D041	24,5-Trichlorophenol	4	400.0	
0042	2,4,6-Trichlorophenol	0.02	2.0	
0017	2,4,5-TP (Silvex)	0.01	1.0	
0043	Vinyl chloride	0.002	0.2	

This is the EPA waste code that belongs on the Notification in area IX A, Characteristics of Nonlisted Hazardous Wastes on the reverse of form 8700-12 (Revision 1-90).

If o-,m-,and p-cresol concentrations cannot be differentiated, the total cresol (D026) concentration is used. The regulatory level for total cresol is 200 mg/L.



EOG Environmental, Inc.

(414) 353-1156 • Fax (414) 353-1822

FEB 26 1991

U. S. EPA, REGION V SWB - PMS

EOG Environmental, Inc. 5611 West Hemlock Street Milwaukee, WI 53223

WID988580056

Subsequent Notification of Regulated Waste Activity

Lax of a copies A. Additional EPA Hazardous Waste Numbers for the TC contaminants:

D018 V	D016	D034	D010
D019 🗸	D027	D008	D011 🗸
D020	D028	D013 🗸	D039 *
D021	D029 🗸	D009	D015
D022	D030	D014	D040 🗸
D023	D012	D035	D041
D024	D031	D036 🗸	D042
D025	D032	D037	D017
D026	D033	D038	D043

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Page 2 EOG Environmental, Inc. 5611 West Hemlock Street Milwaukee, WI 53223

FEB 2 6 1991

U. S. EPA, REGION V SWB - PMS

K049

K037

WID988580056

K008

K093 /

Subsequent Notification of Regulated Waste Activity

B. Additiona	ll Listed Hazardous	Wastes		
F012	K009 ~	K094	K114 -	K038 🗸
F024	K010 *	K025 ✓	K115 🗸	K039
F020	K011 ✓	K026	K116	K040
F021	K048	K027	K117 🖋	K041
F022	K013 ✓	K028 /	K118	K098
F023	K014	K029 -	K136	K042 🛩
F026	K015	K095 ~	K071	K043
F027	K016	K096 -	K073	K099
F028	K017	козо -	K106	K123
K001 ✓	K018	К083	K031	K124
K002 €	K019	K103	K032 ♥	K125
K003 /	K020	K104	K033 🖊	K126 🗸
K004	K021	K085	K034 🗸	K044
K005 ″	K022	K105	K097	K045
K006 ✓	K023 🗸	K111 🗸	K035	K046
K007	K024	K112 🗸	K036	K047

K113 ✓

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Page 3 EOG Environmental, Inc. 5611 West Hemlock Street Milwaukee, WI 53223

WID988580056

Subsequent Notification of Regulated Waste Activity

B. Additional Listed Hazardous Wastes (continued)

K087	K086	P010	P017	P038
K050	K060 🛩	P012	P018	P041 •
K051 🛩	P050 🕶	P011	P045 ~	P040 -
K052 💆	P023	P038 🛩	P021	P043
K061	P002	P036	P022	P060 -
K062	P057	P054	P095 -	P037 -
K064	P058	P067 -	P024	P051 -
K065	P003 🛩	P013	P026 -	P044 -
K066 🖋	P070	P024 🗸	P027	P046
K088	P004 ~	P077	P029 -	P047 -
K090	P005 🗸	P028 /	P030	P048 ~
K091 🛩	P006	P042 /	P031 /	P020 -
K069 🛩	P007	P046 🗸	P033 *	P085
K100	P008	P014 🗸	P034 -	P111
K084 🗸	P009 🚩	P001 🗸	P016	P039 -
K101 🗸	P119 🗸	P028 🗸	P036 -	P049 -
K102 🖋	P099	P015	P037-	P088 -

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WID988580056

Subsequent Notification of Regulated Waste Activity

B. Additional Listed Hazardous Wastes (continued)

		,		
P122	P121	P089	P115	U240 ਁ
P051	P112	P092	P109 -	U112
P066	P118 💆	P093	P110 🛩	U214
P101	P069 🖊	P094 -	P112	U003 ~
P097	P071	P097 -	P113 *	U043
P056 💆	P072 ~	P110 🖊	P116	U006
P065 /	P073 🗸	P098	P123 •	U011 🖷
P059 🛩	P074 ×	P070 "	P118 -	U012
P062 🗸	P075 -	P102 🗸	P120 *	U136 **
P116 -	P076 ✓	P067	P121 -	U014 🗳
P068 🗸	P077 /	P114	U001	U015 ਁ
P063	P078	P103	U034 ဳ	U157
P096 🗸	P081	P104 ~	U249 [*]	U016
P092	P084	P105	U239 ~	U017
P065 🎤	P085	P106	U248	U192 💆
P082 🗸	P087	P107	U187 💆	U018
P064	P088	P108	U005 ″	U094 💆

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WID988580056

Subsequent Notification of Regulated Waste Activity

B. Additional Listed Hazardous Wastes (continued)

		` ′		
U049 -	U207 ~	U036 -	U129 💆	U074 🐃
U093 ″	U023 ″	U026	U057	U075 -
U328 *	U234	U039 🖊	U130 ~	U078 🕶
U353 🗸	U021 🗸	U042 ′	U058 🗸	U079 🗸
U222 🗸	U202 -	U044 ″	U240 -	U025 🛩
U019 ″	U203 ″	U047 🗸	U059 ″	U027 ਁ
U038 -	U248	U048 🗸	U060 ′	U024 ″
U030 ″	U022 💆	U049 🛩	U061 💆	U081 🗸
U035	U197 ਁ	U032 -	U062 •	U082 Î
U037	U225 🗸	U050 •	U063 *	U084 /
U221	U031	U051	U064 ″	U085 -
U028	U136	U052 -	U066 ′	U108 -
U223 -	U215 💆	U053 <	U069 *	U028 ″
U239	U033 ~	U055 🐔	U070 ″	U086 -
U201	U156	U246 •	U071	U087 ″
U220 -	U211	U197 ″	U072 ″	U088 🗸
U020 -	U034 🖊	U056	U073	U089 🗸

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WID988580056

Subsequent Notification of Regulated Waste Activity

B. Additional Listed Hazardous Wastes (continued)

U090 *	U109 "	U218 *	U077 *	U128 ဳ
U091 *	U110*	U226 ″	U359 🟲	U130 *
U092 -	U111	U227 ″	U115 *	U132 -
U093 [*]	U041 *	U359 ″	U116 -	U243 -
U094 *	U177	U173 •	U076 -	U133 ″
U095 *	U174 -	U004 ″	U118 -	U134 -
U096	U155 -	U043 -	U119 *	U135 -
U097 *	U067 -	U042 •	U120-	U137 -
U098 Î	U076 🖍	U078 -	U122 ″	U190 -
U099 Î	U077 -	U079 -	U123 •	U140 -
U101 ″	U131 🖍	U210 *	U124	U141 *
U102	U024 -	U228 -	U125 "	U142 *
U103 *	U117 ′	U112	U147 /	U143 ~
U105	U025 ′	U113 ′	U206 *	U144 *
U106 ·	U184 🗸	U238 "	U126 °	U146 🗸
U107 [*]	U208 -	U114 •	U163 *	U145 🖊
U108	U209 -	U067	U127	U129 🗸

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Page 7 EOG Environmental, Inc. 5611 West Hemlock Street Milwaukee, WI 53223

WID988580056

Subsequent Notification of Regulated Waste Activity

B. Additional Listed Hazardous Wastes (continued)

U148 🗸	U044	U161	U173 -	U186 🔨
U215 🗸	U121 ~	U162	U174	U187
U150 🗸	U036 🐔	U164 -	U176 °	U188
U151 🔦	U154 •	U010 ′	U177 °	U353
U152	U155 ื	U121 *	U178 ″	U328 🐔
U092	U234 "	U167 *	U179 ′	U223 🗖
U029 •	U247	U168 •	U180 -	U220
U045 •	U029 -	U026	U181	U244
U046 •	U186	U165 -	U228	U052
U068 •	U045 -	U047 *	U227 ਁ	U219 🖍
U080 /	U156 🖍	U166 ဳ	U193	U153
U176	U226 🗸	U236 •	U222 🗸	U189 🗹
U138 🖍	U157 💆	U217°	U041	U190 🖊
U237	U158*	U169 "	U182	U191 🗖
U211	U159 💆	U170,	U183	U192 🗸
U235	U160 🗸	U171	U184 ื	· U083
U225 /	U138	U172	U185	U027

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Page 8 EOG Environmental, Inc. 5611 West Hemlock Street Milwaukee, WI 53223

WID988580056

Subsequent Notification of Regulated Waste Activity

B. Additional Listed Hazardous Wastes (continued)

U002 🔪	U205 -	U194 -	U202 🗸
U007 🗸	U216 🖍	U083 💆	U203 🖋
U084 💆	U206 -	U196 🖋	U204 🗸
U243 🗸	U189 🛩	U191 🗸	
U009	U207 💆	U237 🖋	
U152 /	U213	U200 🗸	
U008	U214	U201	

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Wisconsin Department of Natural Resources HAZARDOUS WASTE FACILITY AUDIT (Form 4400-114) - DATE PRINTED: 06/12/91

EPA ID#: DNR FID#: Facility Name: Location Address: Location City/State/Zip:. Mailing Address: Mailing City/State/Zip:.	241384000 EOG ENVIRONMENTAL 5611 W HEMLOCK ST MILWAUKEE, WI 532 5611 W HEMLOCK ST MILWAUKEE, WI 532	INC.	District: County:	SOUTHEAST MILWAUKEE	
Contact Name & Title: Telephone#:	414/353-1156	2000			3. g
Facility Owner: Haz Waste Activity as: Haz Waste Status: Haz Waste Reporting:	Generator - YES LARGE ONTY GENERAT	Transporter - Y DR	ES Treate	r/Storer/Disp	- YES
ACTION REQUIRED Make the	following changes	to this facilit	y record:	H 2 2 2	
() Facility Name			1000000		
() Location Addr					
() Loc City,State,Zip For location change,ne	ew EPA ID# applied	for: ()Yes ()No - expl	ain in comment	s below
() Mailing Addr		0 1	E-01/20	***************************************	
() Mailing City, State, Zi	р		, , ,	1	
() Contact Name & Title	e g	NNO	e 21	1-7-90	٧
() Telephone Number					
() Facility Owner () Haz Waste Status c LQG SQG VSQG OTHER - explain:	hange to: (Circle NON-GEN TRANS	all that apply, TREATER ST	only one ORER DI	generator cate SP RECYC	egory)
() Haz Waste Reporting -	Non-reporting acility no longer i of licensed TSD act f licensed TSD acti	n operation at ivity vity unit cl	03=7		
COMMENTS:	2	× ×			
WDNR District Auditor Name & Dist HWMS Bureau Auditor ch Name If change not approved, c	anges approved & pr	Phone# 263 ocessed by:	-8668		8/91
Name Lange not processed,	nges processed by: Comment:	Phone# 26		Date <i>§-</i> ->	-2-91
US EPA Region V Informati Name If change not processed.				Date	

EPA Form 8700-12 (Rev. 10-88) Previous edition is obsolete.

SEPA

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United States Environmental Protection Agency Washington, DC 20460

1921

Please refer to the *Instructions for Filing Notification* before completing this form. The information requested here is required by law (Section 3010 of the Resource Conservation and Recovery Act).

Continue on reverse

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IV. Installation Contact Phone Number																													
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	ID - For Official Use Only
VIII. Type of Regulated Waste Activity (Mark 'X' in the appropriate boxes. Refer to it	nstructions.)
A. Hazardous Waste Activity	B. Used Oil Fuel Activities
1. Generator (See Instructions) a. Greater than 1000kg/mo (2,200 lbs.) b. 100 to 1000 kg/mo (220 - 2,200 lbs.) c. Less than 100 kg/mo (220 lbs.) 2. Transporter (Indicate Mode in boxes 1-5 below) b. For commercial purposes Mode of Transportation 1. Air 2. Rail 3. Treater, Storer, Disposer (at installation) Note: A permit is required for this activity; see instructions. 4. Hazardous Waste Fuel a. Generator Marketing to Burner b. Other Marketers c. Burner - indicate device(s) - Type of Combustion Device 1. Utility Boiler 2. Industrial Boiler 3. Industrial Furnace 5. Other - specify 5. Other - specify	Off-Specification Used Oil Fuel a. Generator Marketing to Burner b. Other Markerer c. Burner - indicate device(s) - Type of Combustion Device 1. Utility Boiler 2. Industrial Boiler 3. Industrial Furnace 2. Specification Used Oil Fuel Marketer (or On-site Burner) Who First Claims the Oil Meets the Specification
IX. Description of Regulated Wastes (Use additional sheets if necessary)	
I. Ignitable 2. Corrosive 3. Reactive 4. EP Toxic	umber(s) for the EP Toxic contaminant(s))
B. Listed Hazardous Wastes. (See 40 CFR 261.31 - 33. See instructions if you need to list more	then 12 wests codes \ i
1 2 3 4 1 7 8 9 10 10 10 10 10 10 10 10 10 10 10 10 10	5 6 11 12 12 12 12 13 14 15 15 15 15 15 15 15 15 15 15 15 15 15
C. Other Wastes. (State or other wastes requiring an I.D. number. See instructions.)	
1 2 3 4	5 6
X. Certification	
I certify under penalty of law that I have personally examined and am familiar with and all attached documents, and that based on my inquiry of those individe obtaining the information, I believe that the submitted information is true, acceptate the are significant penalties for submitting false information, including the information.	uals immediately responsible for curate, and complete. I am aware
Signature Name and Official Title (type or print) William B. SAWIELL, Print	Date Signed 1/18/96
XI. Comments	
Note: Mall completed form to the appropriate EPA Regional or State Office. (See Section III of	the booklet for addresses.)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5 RCRA ACTIVITIES P.O. BOX A3587 CHICAGO, ILLINOIS 60690

AUG 1 1990

Dear Notifier:

Enclosed you will find the U.S. Environmental Protection Agency (U.S. EPA) Identification (ID) number that has been assigned to your installation. This ID number must appear on all manifest forms when transporting hazardous waste. You will find your ID number on the second line of the copy of the enclosed notification form. This letter confirms that you have filed a Notification of Hazardous Waste Activity (form 8700-12) to comply with Section 3010 of the Resources Conservation and Recovery Act (RCRA). This letter and the enclosed copy of the notification form should be retained for future use.

If you facility is in the state of Michigan and you were previously issued an ID number with an MIG prefix, do not use the MIG number. This is a state number. Be sure to use the MID number only.

If you have any further questions regarding hazardous waste activity, please contact the Region V Solid Waste Hotline at (312) 886-4001.

Sincerely,

Arthur S. Kawatachi Information Section Office of RCRA

Enclosure



State of Wisconsin Dept. of Natural Resources

HAZARDOUS WASTE FACILITY INTERIM LICENSE

RECEIVEL

OFFICE OF RORA

AUTHORIZED CONTACT

Mr. Michael Villione, President EOG Disposal, Incorporated 5611 West Hemlock Street Milwaukee, Wisconsin 53223 U.S. EPA ID #. WID 988580056

DATE ISSUED: March 15, 1994

TYPE OF FACILITY: HAZARDOUS WASTE CONTAINER STORAGE INTERIM LICENSE

LICENSEE: EOG Disposal, Incorporated

NAME OF FACILITY: EOG Disposal, Incorporated

LOCATION OF FACILITY: SW 1/4 of SW 1/4, Section 14, Town 8N, Range 21E, Milwaukee County, 5611 West Hemlock Street, Milwaukee, Wisconsin

FID #: 241384000

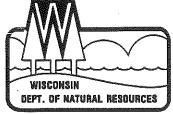
MAXIMUM INTERIM LICENSE STORAGE CAPACITY:

CONTAINER STORAGE: Maximum capacity of 720 fifty-five gallon containers in the layout presented in the interim license application. Approved waste codes: D012 Endrin; D013 Lindane; D014 Methoxychlor; D015 Toxaphene; D016 2,4-D; D018 Benzene; D019 Carbon Tetrachloride; D020 Chlordane; D021 Chlorobenzene; D022 Chloroform; D023 o-Cresol; D024 m-Cresol; D025 p-Cresol; D026 Cresol; D027 1,4-Dichlorobenzene; D028 1,2-Dichloroethane; D029 1,1-Dichloroethylene; D030 2,4-Dinitrotoluene; D032 Hexachlorobenzene; D033 Hexachlorobutadiene; D034 Hexachloroethane; D035 Methyl Ethyl Ketone; D036 Nitrobenzene; D037 Pentachlorophenol; D038 Pyridine; D039 Tetrachloroethylene; D040 Trichloroethylene; D041 2,4,5-Trichlorophenol; D042 2,4,6-Trichlorophenol; and D043 Vinyl Chloride

THIS INTERIM LICENSE IS SUBJECT TO AND CONDITIONED UPON COMPLIANCE WITH THE LICENSEE'S INTERIM LICENSE DETERMINATION DATED MARCH 15, 1994, AND ALL SUBSEQUENT PLAN MODIFICATIONS.

THIS LICENSE AUTHORIZES THE LICENSEE TO OPERATE THE HAZARDOUS WASTE FACILITY DESCRIBED ABOVE. THIS LICENSE IS SUBJECT TO AND CONDITIONED UPON COMPLIANCE WITH THE PROVISIONS OF CHAPTER 144; WISCONSIN STATUTES; CHAPTERS NR 600 TO NR 685, WISCONSIN ADMINISTRATIVE CODE; ANY PLAN APPROVAL AND MODIFICATIONS THEREOF; ANY SPECIAL ORDER AND MODIFICATIONS THEREOF ISSUED BY THE DEPARTMENT AND THE ATTACHED CONDITIONS. ANY EXEMPTIONS FROM THE REQUIREMENTS OF CHAPTERS NR 600 TO NR 685, WISCONSIN ADMINISTRATIVE CODE, ISSUED FOR THIS FACILITY ARE LISTED ABOVE. THIS LICENSE DOES NOT RELIEVE THE LICENSEE OF THE LEGAL OBLIGATION TO MEET ALL OTHER STATE, FEDERAL AND LOCAL PERMIT, ZONING AND REGULATORY REQUIREMENTS.

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State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

George E. Meyer Secretary

July 14, 1993



Southeast District - Annex Building
Post Office Box 12436
4041 N. Richards St.
Milwaukee, Wisconsin 53212
TELEPHONE: 414-961-2727
TELEFAX #: 414-961-2770

In Response Refer To: FID#241384000 County of Milwaukee HW/Licensing File/eogilai.793

Mr. Michael Villione, President EOG Disposal Inc. 5611 West Hemlock Street Milwaukee, WI 53223

Subject: Interim License Application Notice of Incompleteness EOG Disposal, Inc. 5611 West Hemlock Street, Milwaukee, WI

WID 988580056

Dear Mr. Villione:

The Department has reviewed the revised March 1993 interim license application entitled, "Application for an Interim License to Store Hazardous Waste", for EOG Disposal, Inc. (EOG) located at 5611 West Hemlock Street, Milwaukee, Wisconsin. The information was received at the Southeast District on March 8, 1993. The report was prepared by RMT, Inc., of Madison, Wisconsin. The Department has reviewed the interim license application for completeness and technical adequacy and determined that it does not contain the minimum information required pursuant to ss. NR 680.21 and 680.22, Wisconsin Administrative Code, and is, therefore, incomplete and technically inadequate. With this letter, I will first try to clarify what is eligible for an interim license with regard to the Toxicity Characteristic (TC) rule and then review the points of incompleteness and technical inadequacy.

I first want to clarify what the Department concludes EOG is requesting an interim license for and what the Department believes is eligible for an interim license in this situation. EOG was not eligible for an interim status for the TC rule from the federal government because their PART A application was not submitted within the required time frame. However, because some materials are considered solid waste by the state of Wisconsin, but are not considered solid wastes by the federal government, these materials:

- 1. would not have been affected by the federal implementation of the TC rule.
- 2. would only have become hazardous waste because of the state of Wisconsin's implementation of the TC rule, and
- 3. would be eligible for an interim license from the state even though they did not receive interim status from the federal government.



EOG submitted a revised PART A application on December 1, 1992 which was within three months of the original effective date of the state's TC rule, September 1, 1992, which first rendered EOG subject to the requirement to obtain an operating license in accordance with s. NR 680.20, Wisconsin Administrative Code, and is therefore eligible for an interim license from the state.

For a waste stream to be eligible for an interim license because of the state implementation of the TC rule, the waste stream has to satisfy the following parameters:

- 1. the waste stream was handled by EOG before the promulgation of the state TC rule, and
- 2. the material would be considered a solid waste by the state of WI, but would not meet the federal definition of a solid waste, and
- 3. the waste stream is a hazardous waste only because of the TC waste codes, and would not have been a hazardous waste because of the previous EP toxicity requirements.

Table 1 of the March 8, 1993 revised interim status submittal provides useful information regarding the various waste streams that EOG handles. Using that as a starting point, the Department would like EOG to specify which of these waste streams EOG is requesting to be covered by an interim license. For the waste streams that EOG is requesting an interim license, the Department would like to see a justification from EOG as to how each of the waste streams satisfies the above three parameters required for eligibility for an interim license.

EOG's recycling and fuel blending activities may be exempt from the hazardous waste licensing requirements as they are part of hazardous waste fuel marketing activities, but there are specific requirements which EOG will need to comply with in order operate these activities. The Department at this time requests that EOG submit to the Department a submittal which explains their activities as a marketeer of hazardous waste fuel and how they comply with the requirements of s. NR 625.07, Wisconsin Administrative Code.

The following information must be submitted within 30 days of the date of this letter in order for the interim license application to be complete and technically adequate. EOG can submit revised pages to the interim license application rather than submit an additional revised interim license application.

- 1. EOG shall specify which of the waste streams listed in Table 1 of the March 8, 1993 interim license application they are requesting to be covered by an interim license.
- 2. For each of the waste streams EOG is requesting an interim license for, EOG shall submit to the Department justification as to how each of those waste streams satisfies the above three parameters required for eligibility for an interim license in this situation.

- 3. EOG shall specifically state what will be the aisle space between containers.
- 4. EOG shall state how containers will be accessed and removed during a spill or emergency.
- 5. EOG shall document that the local fire department finds that the container storage arrangement is adequate for handling an emergency at the site.
- 6. EOG shall explain how long waste will be kept on site before the analysis is completed and the manifest is signed off on.
- 7. EOG shall explain how they comply with the general site selection requirements of s. NR 630.18, Wisconsin Administrative Code.
- 8. EOG shall provide in the contingency plan documentation of contacts and agreements with the local police department, the fire department, hospitals, contractors and emergency response teams to coordinate emergency services. s. NR 630.22(1)(e)7, Wisconsin Administrative Code.
- 9. In accordance with s. NR 630.22(1)(c), Wisconsin Administrative Code, EOG shall explain in the contingency plan that when the facility is active an emergency coordinator will always be on site.
- 10. EOG shall incorporate into the contingency plan a description of the type of wastes handled and their associated hazards. s. NR 630.22(1)(e)2, Wisconsin Administrative Code.
- 11. EOG shall provide in the contingency plan a description of the procedures that will be used to notify the local police department, the fire department, hospitals and emergency response teams. s. NR 630.22(1)(e)5.
- 12. EOG shall point out in the contingency plan the emergency coordinator's need to monitor for leaks, pressure buildup, gas generation or ruptures in valves pipes or other equipment if the facility stops operation in response to a fire, explosion or discharge. s. NR 630.22(2)(a)7, Wisconsin Administrative Code.
- 13. If EOG's closure cost estimates do not follow the requirements in s. NR 685.07(3), Wisconsin Administrative Code, they shall be corrected.
- 14. EOG shall explain how they will be in compliance with the general storage standards in ss. NR 640.11(1), 640.12(1), 640.13(2) and (3), 640.15(2), and 640.16(2), Wisconsin Administrative Code.
- 15. EOG shall explain how they will be in compliance with the container storage standards in ss. NR 640.09, 640.11(2) and (3), 640.14, 640.15(1)(2)(a) and (b), and 640.10, Wisconsin Administrative Code.

- 16. EOG shall provide a legal description of the site.
- EOG shall identify potentially incompatible materials that could be handled on site.
- EOG shall submit to the Department a submittal which explains their activities as a marketeer of hazardous waste fuel and how they comply with the requirements of s. NR 625.07, Wisconsin Administrative Code.

Please provide four copies of all information to be submitted to the Department in response to this letter. Your response shall include a cover letter responding to each of the deficiencies noted above along with necessary inserts to the interim license application report. Revised pages shall be clearly identified as revisions and properly dated. Two copies should be mailed to Barbara Zellmer - SW/3, Bureau of Solid and Hazardous Waste Management, p.O. Box 7921, Madison, Wisconsin, 53707, and two copies to Patrick Brady, DNR Southeast District, P.O. Box 12436, Milwaukee, Wisconsin, 53212.

This letter is not a denial of the interim license application, but merely indicated that the Department has not received the minimum information as required by chs. NR 600 through 685, Wisconsin Administrative Code.

If you believe you have the right to challenge this decision, you should know that Wisconsin Statutes and administrative rules establish time periods within which requests to review Department decisions must be filed.

For judicial review of the decision pursuant to ss. 227.52 and 227.53, Wisconsin Statutes, you have 30 days after the decision is mailed, or otherwise served by the Department, to file your petition to the appropriate Circuit Court and serve the petition on the respondent, the Department of Natural Resources.

This notice is provided pursuant to s. 227.48(2), Wisconsin Statutes.

Please contact me at 414/961-2717, if you have any comments or questions.

Sincerely,

Patrick Brady

Waste Management Engineer

Southeast District

SED Casefile (W. Ebersohl, P. Brady) E. Lynch - SW/3 - HWMS C. Slaustas, U.S. EPA - Region 5, 5HRP/8J

Douglas Wierman - RMT



January 7, 1993

Carroll D. Besadny Secretary

State of Wisconsin

DEPARTMENT OF NATURAL RESOURCES

Southeast District - Annex building



Post Office Box 12436 4041 N. Richards St. Milwaukee, Wisconsin 53212 TELEPHONE: 414-961-2727 TELEFAX #: 414-961-2770

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OFFICE OF RCRA Waste Management Division U.S. EPA, REGION V

In Response Refer to: FID#241384000 Milwaukee County HW Licensing File/ackeog.193

Mr. Michael Vilione, President EOG Disposal, Inc. 5611 West Hemlock Street Milwaukee, WI 53223

SUBJECT:

EOG Disposal, Inc.
WID 988580056
Acknowledgement of Receipt &
Notice of Incompleteness for an
Interim License Application

Dear Mr. Vilione:

This letter acknowledges receipt of an interim license application entitled "Application for an Interim License to Treat and Store Hazardous Waste" for EOG Disposal, Inc. located at 5611 West Hemlock Street, Milwaukee Wisconsin. The EPA ID number for this facility is WID 988580056. The information was received by the Southeast District Headquarters on December 1, 1992. It was prepared by RMT, Inc. and has been reviewed for completeness by the Department.

In accordance with procedures detailed in s. NR 680.24, Wisconsin Administrative Code and the requests made by the Department at the November 2, 1992 meeting, the Department has reviewed the "Interim Status (License) Application" for completeness and has determined that it does not contain the minimum information required pursuant to ss. NR 680.21 and NR 680.22, Wisconsin Administrative Code, and is, therefore, incomplete.

EOG Disposal's eligibility for an interim license is based on the effect of the adoption of the Toxicity Characteristic (TC) rule. Some of the solid wastes managed at the site are now classified as hazardous waste because of the adoption of the TC rule. The interim license application can only address those wastes which were solid wastes before the implementation of the TC rule and are now hazardous waste because of the TC rule. Management of wastes (treatment and storage in specific units) can only be included on the interim license if the following apply: the unit existed at the facility at the time of the effective date of the rule; if required, the unit had solid waste management approval; and the unit would require a hazardous waste operating license. The effective date of the TC rule in Wisconsin was 9-1-92. Any treatment and storage of hazardous waste outside of the interim license



conditions would need to be applied for as part of a request for an operating license.

The Department does not understand the connection between the TC rule and the inclusion of the waste codes D001 (ignitability), D003 (corrosivity), and F001 to F005 (solvents) and would like EOG Disposal to explain their inclusion and why these waste codes would not have been covered in the past. In addition, the Department will need EOG Disposal to clarify that each of the waste streams managed at the facility which are hazardous waste under the TC rule for waste codes D004 through D017 (metals and pesticides) were not hazardous waste under the EP Toxicity rule.

The Department believes that management of solid waste at the facility presently consists of storage and treatment in 1500 containers (55 gallon drums) and bulk storage of 20 cubic yards of batteries, 20 cubic yards of scrap metal, 20 cubic yards of non-metal solids, 20 cubic yards of bulk solids, and 40 cubic yards of reusable empty drums. The interim license can only address bulk storage in units which were approved under the solid waste management section and that contain waste streams that were affected by the TC rule. Since the two 8000 gallon tanks mentioned in the report are not approved as solid waste management units, and are not, to the best of the Department's knowledge, in place; these units would not be eligible for an interim license.

Since exempt hazardous waste recycling activities, in and of themselves, would not require a hazardous waste operating license, they would not be eligible for an interim license. However, except for legitimate recovery and reclamation, exempt hazardous waste recycling activities do require a written approval from the Department. For activities identified in the application that EOG Disposal is claiming to conduct under s. NR 625.08, Wisconsin Administrative Code, EOG Disposal must submit a written recycling exemption request to the Department and receive a written approval from the Department. For activities covered under s. NR 625.07(6), Wisconsin Administrative Code, EOG Disposal must comply with the requirements of that section which include notifying the Department. For activities covered under s. NR 625.06, Wisconsin Administrative Code, EOG Disposal must comply with the requirements of that section. The Department requests that EOG Disposal go over each possible recycling activity with the Department to receive concurrence as to what the applicable regulations are for that activity.

The Department has received a check in the amount of \$500 to cover the interim license report plan review fee noted in s. 680.45 (Table XII), Wisconsin Administrative Code. Since the interim license report plan review fee is \$500 per activity, EOG Disposal needs to submit \$500 per each activity which in this case includes storage in tanks, storage in containers and miscellaneous treatment units. That would amount to \$1500 total in interim license plan report review fees. In addition, interim license applications for commercial storage in tanks and containers, and treatment in miscellaneous units require fees of \$4000 each. These are one-time only fees to cover the interim license period until a final determination on issuance of an operating license is made by the Department. So to cover all of the above fees, EOG Disposal will need

to submit an additional check for \$13,000. The fees above are based on the activities for which EOG Disposal requested an interim license in their application. With revisions to EOG Disposal's interim license application concerning the activities EOG Disposal requests to have interim licensed, the above fees would change accordingly.

The following information must be submitted within 30 days from the date of this letter in order for the interim license application to be complete:

- 1. EOG Disposal shall review their operations and determine what activities are appropriate for an interim license application and submit appropriate revisions to the application.
- 2. EOG Disposal shall list and clearly explain in detail each waste handling operation at the facility which includes: storage, recycling, waste mixing, and treatment. EOG Disposal shall also provide the starting date of each operation, EOG Disposal's interpretation and justification as to how these operations should be classified and what regulations apply to them, whether the operation was regulated by the solid waste management section, whether EOG Disposal had approval from the solid waste section for the operation and if the operation handles TC rule wastes.
- 3. EOG Disposal shall provide a history of waste streams managed at the facility; the methods used to determine whether or not the waste stream was a hazardous waste (including whether or not a test was run for EP Toxicity); the processing, treatment or recycling performed on the waste stream; and whether the waste stream is hazardous under the TC rule.
- 4. Even though the activities associated with the hazardous waste closure are very similar to the activities associated with the solid waste closure, separate closure cost estimates and proofs of financial responsibility will need to be maintained. EOG Disposal will need to maintain a separate hazardous waste closure proof of financial responsibility.
- 5. Storage of bulk containers of scrap metal and reusable empty drums are not affected by the TC rule. EOG Disposal's solid waste management approval only allows for outside storage in bulk containers of scrap metal and reusable empty drums. Solid waste management approvals restrict all other bulk container storage to inside the building. Therefore, under a hazardous waste interim license, storage in bulk containers would be restricted to inside the building.
- 6. Section 1.2 of the interim license application states, "The storage will be conducted incidental to the exempt waste recycling activities". EOG Disposal shall explain what is meant by that statement.
- 7. EOG Disposal shall submit to the Department a copy of the original Part A that was sent to EPA.

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8. EOG Disposal shall submit an additional check for \$13,000, (or other value appropriate to any revisions to the interim license application), which is required to cover the interim license report and application fees.

The Department has additional concerns which need to be adequately addressed before the interim license is issued. These issues are not items of incompleteness; rather, they are technical inadequacies that you should address now to expedite the review process.

- 1. EOG Disposal shall show what type of mechanism they will use for updating the closure proof mechanism.
- 2. EOG Disposal shall show proof to the Department on how they comply with the liability requirements in s. NR 685.08, Wisconsin Administrative Code.
- 3. The interim license submittal needs more specific detail in regards to descriptions of the waste managing operations at the facility including drawings of the waste managing areas.
- 4. Site security will have to be explained in more detail for the Department to approve the interim license application.
- 5. A flow chart showing the analyses performed on the various wastes managed at the facility shall be submitted. Some verification sampling of wastes will need to be performed on the wastes as they are received on site. EOG Disposal shall explain what procedures would be taken if an unapproved waste stream was accepted on site.
- 6. If the same units are to be used for managing hazardous waste and solid waste, EOG Disposal shall explain what decontamination procedures will take place.
- The Department requests that EOG Disposal verify that the locating directions on the pictures with the Part A application are correct.
- 8. The reference to attachment 3 in section 1.5 of the interim license application should be changed to attachment 4.

Please provide four copies of all information to be submitted to the Department in response to this letter. Your response should include a cover letter responding to each of the deficiencies noted above along with necessary inserts to the interim license application report. Revised pages should be clearly identified as revisions and properly dated. Two copies should be mailed to Barbara Zellmer - SW/3, Bureau of Solid & Hazardous Waste Management, P.O. Box 7921, Madison, Wisconsin, 53707, and two copies to Mr. Patrick Brady, DNR Southeast District, Box 12436, Milwaukee, Wisconsin, 53212.

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This notice is provided pursuant to Section 227.48(2), Statutes.

Please contact me at 414/961-2717, if you have any comments or questions.

Sincerely,

Patrick Brady

Waste Management Engineer

cc: SED Casefile (W. Ebersohl, P. Brady)

Ed Lynch - SW/3

Douglas Wierman, Project Director, RMT, Inc., Madison, WI

Chuck Slaustas, U.S. EPA - Region 5, 5HRP/8J